

# **EXHIBIT 6**

1           IN THE UNITED STATES DISTRICT COURT  
2           FOR THE NORTHERN DISTRICT OF OHIO  
3           EASTERN DIVISION  
4           -   -   -  
5

6           IN RE:   NATIONAL                   :   HON. DAN A.  
7           PRESCRIPTION OPIATE           :   POLSTER  
8           LITIGATION                   :     
9   :     
10          APPLIES TO ALL CASES           :   NO.  
11   :   1:17-MD-2804  
12   :     
13

14                   - HIGHLY CONFIDENTIAL -  
15

16          SUBJECT TO FURTHER CONFIDENTIALITY REVIEW  
17

18                   VOLUME I  
19                   -   -   -  
20

21                   April 17, 2019  
22                   -   -   -  
23

24                   Videotaped deposition of  
25          THOMAS PREVOZNIK, taken pursuant to  
26          notice, was held at the law offices of  
27          Williams & Connolly, 725 12th Street,  
28          Washington, D.C., beginning at 9:11 a.m.,  
29          on the above date, before Michelle L.  
30          Gray, a Registered Professional Reporter,  
31          Certified Shorthand Reporter, Certified  
32          Realtime Reporter, and Notary Public.  
33                   -   -   -  
34

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16 (Via telephone)

(Motley Rice)

17

18 VIDEOTAPE TECHNICIAN:

Chris Ritona

19

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23

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- - -

2

THE VIDEOGRAPHER: We are

3

now on the record. My name is

4

Chris Ritona. I am the

5

videographer with Golkow

6

Litigation Services.

7

Today's date is April 17,

8

2019, and the time is

9

approximately 9:11 a.m.

10

This video deposition is

11

being held at Williams & Connolly,

12

LLP, 725 12th Street Northwest,

13

Washington, DC, in the matter of

14

National Prescription Opiate

15

Litigation, MDL No. 2804, case

16

Number 17-MD-2804, for the United

17

States District Court, Northern

18

District of Ohio, Eastern

19

Division.

20

The deponent today is Thomas

21

Prevoznik. And all counsel will

22

be noted upon the stenographic

23

record.

24

The court reporter today is

1 Michelle Gray, and she will now  
2 please swear in the witness.

3 - - -

4 ... THOMAS PREVOZNIK, having  
5 been first duly sworn, was  
6 examined and testified as follows:

7 - - -

8 EXAMINATION

9 - - -

10 BY MS. MAINIGI:

11 Q. Good morning, Mr. Prevoznik.

12 A. Good morning.

13 Q. I will begin the  
14 questioning. My name is Enu Mainigi, and  
15 I'm going to begin the questioning on  
16 behalf of the defendants, and then there  
17 are other defendants that may question  
18 you after I'm done, and then the  
19 plaintiffs will question you thereafter.

20 Mr. Prevoznik, I have put in  
21 front of you Exhibit 1. And Exhibit 1 is  
22 the notice of deposition.

23 (Document marked for  
24 identification as Exhibit

1 report suspicious orders?

2 A. Yes.

3 Q. And there's no single  
4 feature that makes a suspicious order  
5 monitoring system compliant, correct?

6 A. Correct.

7 Q. And the DEA leaves it up to  
8 the registrant to design a system that  
9 works with its own business model and  
10 customer base, correct?

11 A. Correct.

12 Q. Does it matter to the DEA  
13 whether a registrant reviews orders  
14 manually or uses an automated system?

15 A. No, it doesn't matter.

16 Q. Other than requiring that  
17 the report, suspicious order report  
18 clearly indicate that the order is  
19 suspicious, does DEA require suspicious  
20 order reports to follow a particular  
21 format?


22 A. That's correct.

23 Q. Let me ask the question  
24 again. The DEA does not require

1  
2 CERTIFICATE  
3  
4

5 I HEREBY CERTIFY that the  
6 witness was duly sworn by me and that the  
7 deposition is a true record of the  
8 testimony given by the witness.

9 It was requested before  
10 completion of the deposition that the  
11 witness, THOMAS PREVOZNIK, have the  
12 opportunity to read and sign the  
13 deposition transcript.

14   
15 MICHELLE L. GRAY,  
16 A Registered Professional  
17 Reporter, Certified Shorthand  
18 Reporter, Certified Realtime  
19 Reporter and Notary Public  
20 Dated: April 22, 2019  
21  
22  
23  
24

(The foregoing certification  
of this transcript does not apply to any  
reproduction of the same by any means,  
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supervision of the certifying reporter.)